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April 14, 2019

**BY ECF**

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Latique Johnson, et al.*, S1 16 Cr. 281 (PGG)**

Dear Judge Gardephe:

I write on behalf of defense counsel in this case requesting that the Court extend the time to file post-trial motions for one week. The government consents to this request so long as the Court extends the time the government must respond to defendants' post-trial motions by one week.

At the close of the trial proceedings defense counsel in the above-entitled case asked for 3 weeks to file post-trial motions but at the time of that request defense counsel were optimistic that this would be sufficient time. Counsel for Latique Johnson, Donnell Murray and Brandon Green have each faced obstacles which have made it difficult to timely file motions by April 18, 2019 including but not limited to: sickness, travel and filing commitments in other pending cases. We do anticipate that one additional week will be more than sufficient to adequately prepare post-trial motions. If the Court requires further information or documentation please do not hesitate to ask. Thank you for your consideration of this matter.

Respectfully,

/s/ Paula Notari

Paula Notari

/s/ Ezra Spilke

Ezra Spilke

Counsel for Latique Johnson

cc: All Attorneys ECF

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

Paul G. Gardephe  
Paul G. Gardephe, U.S.D.J.

Dated: April 15, 2019

*The Government's time to respond is likewise extended one week*